

**SFM 05/06
Part 2
Chapter 4**

Section 403.13

Public comment from:

Armin Wolski, P.E.
1429 Navellier St.
El Cerrito, CA 04530

Requests that this section or reference provision be recommended: **Approved as amended**

Suggested revisions to the Text of the Regulations:

Original Language:

~~**403.13 Smoke proof exit enclosures.** Every required stairway serving floors more than 75 feet (22 860 mm) above the lowest level of fire department vehicle access shall comply with Section 909.20 and 1020.1.7. **Smoke Control.**~~

~~**403.13.1 Smoke Control System.** All portions of high-rise buildings shall be provided with a smoke control system in accordance with Section 909.~~

Proposed Language:

~~**403.13 Smoke proof exit enclosures.** Every required stairway serving floors more than 75 feet (22 860 mm) above the lowest level of fire department vehicle access shall comply with Section 909.20 and 1020.1.7. **Smoke Control.**~~

~~**403.13.1 Smoke Control System.** High-rise buildings shall be provided with either a passive or active smoke control system in accordance with Section 909.~~

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve as Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

- 1) The proposed building standard is unreasonable, arbitrary, unfair, or capricious, in whole or in part.

The proposed SFM language has been shown to be arbitrary in practice. Experience has shown that without qualifying the language with the words either passive or active (as permitted by Section 909), the authorities having jurisdiction assume the fire marshal means active systems.

- 2) The cost to the public is unreasonable, based on the overall benefit to be derived from the building standards.

The costs associated with active smoke control systems in many types of high rises, particularly office buildings, or well compartmentalized buildings has not been justified. In theory, one may use a combination of passive and active systems, however, in practice, it has been clear that the code has been enforced to require expensive active systems throughout. The cost-benefits of these systems have never been proven.

- 3) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.

The wording "All portions" is ambiguous and vague. Does it mean that a closet needs smoke control. The proposed language is less vague insofar that it recognizes that smaller spaces don't need active smoke control systems.

Please see attached letter. [Note from CBSC staff: No letter was attached, but it is presumed that, since Mr. Wolski's facsimile comment came from ARUP, the exhibit letter attached to the ARUP comment on Section 403.13 is also the letter referenced by Mr. Wolski.]